

APR 11 1988 Action Manufacturing Company

MANUFACTURING • ORDNANCE • ENGINEERING

April 08, 1988

CERTIFIED MAIL

Action  
Manufacturing  
Company

Ms. Nancy R. Roncetti  
Compliance Specialist  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
1875 New Hope Street  
Norristown, PA 19401

RE: Plant #5  
Atglen, Chester County

Dear Ms. Roncetti:

Attached are the results of the analysis conducted on the three explosive waste streams generated at the facility noted above as you requested by telephone on April 04, 1988. I apologize for my error in not providing this information earlier.

These explosive waste stream samples were analyzed for a possible determination of nonapplicability under Subchapter V of The Solid Waste Management Act. This letter does not constitute a formal request to the Department for a determination of nonapplicability as required in 75.260.b. Such a request will be made in conjunction with a proposal for the thermal destruction of explosive wastes in an "incinerator" (secondary and pyrotechnic only).

Presently being developed is a method for the chemical destruction of the primary explosive wastes. Additionally, preliminary negotiations are underway with a reputable consulting firm for the development of an approved closure plan for the explosive waste destruction pits.

Sincerely,

ACTION MANUFACTURING COMPANY

*Daniel C. Ellenberger*

Daniel C. Ellenberger, CSP  
Manager, Safety

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P 412 918 296

AR100075

Specialists In U.S. Ordnance Products

100 East Erie Avenue Philadelphia, PA 19134 215 739-6400 TWX 710 670-0279 ACTION MFG CO

## ANALYSIS REPORT

Lancaster Laboratories, INCORPORATED

2426 NEW HOLLAND PIKE, LANCASTER, PA 17601-6884 (717) 656-2301

Lancaster LLI Sample No. TL 1226130

Action Manufacturing  
100 East Erie Avenue  
Philadelphia, PA 19134-1009

Date Reported 1/28/88  
Date Submitted 1/ 8/88  
Discard Date 2/ 5/88  
Collected by C  
P.O. PHB 093  
Rel.

EP Toxicity Leachate of 5-PRI-1187-1 Water Sample  
Collected on 11/13/87 at 0830, 11/17/87 at 0800,  
11/18/87 at 0800, and 11/19/87 at 1600

ANALYSIS	RESULT AS RECEIVED	LIMIT OF DETECTION	LAB CODE
Arsenic	< 0.02 mg/l	0.02	024502500
Barium	1.0 mg/l	0.1	024601300
Cadmium	0.009 mg/l	0.005	024901300
Chromium	< 0.05 mg/l	0.05	025101300
Lead	34.0 mg/l	0.05	025501300
Mercury	< 0.001 mg/l	0.001	025902500
Selenium	< 0.02 mg/l	0.02	026402500
Silver	0.07 mg/l	0.01	026601300
Filtration charge for Leachate			900102500

The above analyses were performed on an EP Toxicity leachate of the submitted waste prepared according to the procedure specified in Federal Register May 19 1980 p. 33127.

The characteristic of EP Toxicity is determined by whether any of the contaminant concentrations (mg/l) in the leachate exceed the following maxima (100 X's Primary Drinking Water Standards): Arsenic 5.0;

Barium 100.0; Cadmium 1.0; Chromium 5.0; Lead 5.0; Mercury 0.2;

Selenium 1.0; Silver 5.0; Endrin 0.02; Lindane 0.4; Methoxychlor 10.0;

Toxaphene 0.5; 2,4-D 10.0; 2,4,5-TP 1.0

Since the total suspended solids of the sample was less than 5000 mg/l (0.5% by weight) the EP Toxicity leachate is prepared by passing the sample through a 0.45 micron membrane filter. The above analyses were performed on such a filtrate.

Based on the determinations performed, the submitted sample DOES exhibit the characteristic of EP Toxicity as defined in Section 261.24 Federal Register 1980 p. 33122. Lead exceeds the limit.

The reporting limits for certain determinations were raised due to the nature of the sample.

1 COPY TO Action Manufacturing

ATTN: Daniel Ellenberger

AR100076

The American Association for  
Laboratory Accreditation  
Chemical & Biological fields of testing



03505 35.00 020000



SEE REVERSE SIDE FOR EXPLANATION  
OF SYMBOLS AND ABBREVIATIONS AND  
OUR STANDARD TERMS AND CONDITIONS

Respectfully Submitted  
Lancaster Laboratories, Inc.  
Reviewed and Approved by:

Timothy S. Oostdyk, B.A.  
Group Leader, Inorganics

## ANALYSIS REPORT

Lancaster Laboratories

INCORPORATED

2425 NEW HOLLAND PIKE LANCASTER, PA 17601 (717) 866-2301

LLI Sample No. TL 1226129

Action Manufacturing  
100 East Erie Avenue  
Philadelphia, PA 19134-1009

Date Reported 1/28/88  
Date Submitted 1/ 8/88  
Discard Date 2/ 5/88  
Collected by C  
P.O. PHB 093  
Rel.

EP Toxicity Leachate of 5-SEC-1187-2 Water Sample  
Collected on 11/13/87 at 0840, 11/17/87 at 0810,  
11/18/87 at 0810, and 11/19/87 at 1615

ANALYSIS	RESULT AS RECEIVED	LIMIT OF DETECTION	LAB CODE
Arsenic	< 0.02 mg/l	0.02	024502500
Barium	0.3 mg/l	0.1	024601300
Cadmium	0.053 mg/l	0.005	024901300
Chromium	0.44 mg/l	0.05	025101300
Lead	< 0.05 mg/l	0.05	025501300
Mercury	< 0.01 mg/l	0.01	025902500
Selenium	< 0.02 mg/l	0.02	026402500
Silver	< 0.01 mg/l	0.01	026601300
Filtration charge for Leachate			900102500

The above analyses were performed on an EP Toxicity leachate of the submitted waste prepared according to the procedure specified in Federal Register May 19 1980 p. 33127.

The characteristic of EP Toxicity is determined by whether any of the contaminant concentrations (mg/l) in the leachate exceed the following maxima (100 X's Primary Drinking Water Standards):

Arsenic 5.0;  
Barium 100.0; Cadmium 1.0; Chromium 5.0; Lead 5.0 ; Mercury 0.2;  
Selenium 1.0; Silver 5.0; Endrin 0.02; Lindane 0.4; Methoxychlor 10.0  
Toxaphene 0.5; 2,4-D 10.0; 2,4,5-TP 1.0

Since the total suspended solids of the sample was less than 5000 mg/l (0.5% by weight) the EP Toxicity leachate is prepared by passing the sample through a 0.45 micron membrane filter. The above analyses were performed on such a filtrate.

Based on the determinations performed, the submitted sample DOES NOT exhibit the characteristic of EP Toxicity as defined in Section 261.24 Federal Register 1980 p. 33122.

The reporting limits for certain determinations were raised due to the nature of the sample.

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ATTN: Daniel Ellenberger

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Group Leader, Inorganics

## ANALYSIS REPORT

Lancaster Laboratories

INCORPORATED

2425 NEW HOLLAND PIKE LANCASTER, PA 17601-5584 (717) 856-2301

Sample No. TL 122612

Action Manufacturing  
100 East Erie Avenue  
Philadelphia, PA 19134-1009

Date Reported 1/28/88  
Date Submitted 1/ 8/88  
Discard Date 2/ 5/88  
Collected by C  
P.O. PHB 093  
Rel.

EP Toxicity Leachate of 5-PYR-1187-3 Water Sample  
Collected on 11/13/87 at 0850, 11/17/87 at 0820,  
11/18/87 at 0815, and 11/19/87 at 1645

ANALYSIS	RESULT AS RECEIVED	LIMIT OF DETECTION	LAB CODE
Arsenic	< 0.02 mg/l	0.02	024502500
Barium	0.2 mg/l	0.1	024601300
Cadmium	< 0.005 mg/l	0.005	024901300
Chromium	0.81 mg/l	0.05	025101300
Lead	< 0.05 mg/l	0.05	025501300
Mercury	< 0.001 mg/l	0.001	025902500
Selenium	< 0.02 mg/l	0.02	026402500
Silver	< 0.01 mg/l	0.01	026601300
Filtration charge for Leachate			900102500

The above analyses were performed on an EP Toxicity leachate of the submitted waste prepared according to the procedure specified in Federal Register May 19 1980 p. 33127.

The characteristic of EP Toxicity is determined by whether any of the contaminant concentrations (mg/l) in the leachate exceed the following maxima (100 X's Primary Drinking Water Standards): Arsenic 5.0; Barium 100.0; Cadmium 1.0; Chromium 5.0; Lead 5.0; Mercury 0.2; Selenium 1.0; Silver 5.0; Endrin 0.02; Lindane 0.4; Methoxychlor 10.0 Toxaphene 0.5; 2,4-D 10.0; 2,4,5-TP 1.0

Since the total suspended solids of the sample was less than 5000 mg/l (0.5% by weight) the EP Toxicity leachate is prepared by passing the sample through a 0.45 micron membrane filter. The above analyses were performed on such a filtrate.

Based on the determinations performed, the submitted sample DOES NOT exhibit the characteristic of EP Toxicity as defined in Section 261.24 Federal Register 1980 p. 33122.

The reporting limits for certain determinations were raised due to the nature of the sample.

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ATTN: Daniel Ellenberger

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